



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
American Northwest Recycling, Port Orchard, WA

FROM: Daniel Heins, Environmental Scientist
AECAB (IL/IN)

THRU: Nathan Frank, Section Supervisor
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: American Northwest Recycling

Facility Location: 6505 SW Old Clifton Road, Port Orchard, WA

Date of Inspection: August 1, 2022

EPA Inspector(s):

1. Daniel Heins, Environmental Scientist

Other Attendees:

1. Jason Warren, Owner – American Northwest Recycling

Contact Email Address: americannorthwestrecycling@gmail.com

Purpose of Inspection: Ozone depleting substances/refrigerants compliance inspection

Facility Type: Scrap yard

Regulations Central to Inspection: 40 CFR Part 82 Subpart F

Arrival Time: 12:00

Departure Time: 12:55

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet (via email)
- ☐ Small Business Resource Information Sheet not provided.
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Jason Warren.

Process Description:

The Facility receives and processes scrap metal, including cars, from commercial sources, the general public, and scrap peddlers. The Facility receives the loads of scrap and separates out different metal types for re-sale. The Facility has a crusher, but no baler or shredder. Some vehicles are crushed before resale, others are not.

Staff Interview:

The Facility does not intentionally accept air conditioners, refrigerators, or other refrigerant-containing appliances from peddlers or the general public. If the Facility receives any of these appliances hidden in a load of scrap, Jason Warren stated that he would remove the refrigerant with one of their recovery machines. He stated that this is infrequent enough that he is not sure the last time he had to send off a full tank of refrigerant, and that when that happens he will figure out where to send it to and keep the record of that.

The Facility does not currently remove refrigerants from vehicles, but Jason Warren stated that they have ordered a recovery device to be able to start doing this, but it had been delayed due to supply chain issues.

The Facility does receive appliances from contracted suppliers who remove refrigerants prior to arrival, though Jason Warren stated that the employee who keeps track of records was not in that day and he would provide the refrigerant removal contracts by email as a follow up.

Jason Warren stated that the Facility that while they do not have a sign saying they do not accept refrigerators or similar appliances, their staff reject these at the scale. Daniel Heins viewed the Facility's website on August 4, 2022 and did not find see any statements specifically stating they accept or reject potentially refrigerant-containing appliances.

Jason Warren stated that cars that come in "dry" with all fluids (including refrigerants) removed are given a higher price than cars that still have refrigerants or other fluids. Jason Warren stated that they do not remove condensers/motor vehicle air conditioners (MVACs) from cars and that they sell the cars to Schnitzer as is. He noted that most customers with MVACs already empty do

not have documentation of proper recovery, but he was under the impression that Schitzer is the final processor and that he does not have an obligation to ensure proper recovery. He stated that cars are sent both crushed and intact to Schnitzer.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations:

Jason Warren walked Daniel Heins through the Facility. The refrigerant recovery device was on a shelf behind boxes of scrap, next to an older recovery unit that is not currently used. There were not any refrigerators or air conditioning units in the scrap pile with appliances that day. Daniel Heins observed large, detached cooling coils that Jason Warren said came from a large unit from a commercial supplier.

Photos and/or Videos: were taken during the inspection. See Appendix A.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Contracts for refrigerant removal for suppliers of refrigerant-containing appliances active in the past year
- Make/model/certification information for the refrigerant recovery device currently in use and the soon-to-arrive device
- Past three days or otherwise most recent statements on file of refrigerant removal for received vehicles

Compliance Assistance:

Daniel Heins provided via email links to EPA resources on compliance with ozone depleting substances regulations and highlighted the most relevant provisions for the Facility's operations. During the inspection Daniel Heins explained the requirements for safe disposal of appliances under Subpart F.

Concerns:

Daniel Heins expressed concern that the Facility may be considered the “final processor” for vehicles, especially those that are crushed, and that they are not currently ensuring cars are properly drained of refrigerant.

Jason Warren stated that the refrigerant recovery device was expected to arrive the week of August 8th and that once that arrives, they will use that on all cars coming in to ensure refrigerants are properly recovered before crushing or sending them off site.

DIGITAL SIGNATURES

Report Author: _____

Section Supervisor: _____

Facility Name: Binford Metals
Facility Location: 26133 78th Avenue S, Kent, WA
Date of Inspection: August 2, 2022

APPENDICES AND ATTACHMENTS

Appendix A: Digital Image Log

Facility Name: Binford Metals

Facility Location: 26133 78th Avenue S, Kent, WA

Date of Inspection: August 2, 2022

APPENDIX A: DIGITAL IMAGE LOG

Inspector Name: Daniel Heins	1. Archival Record Location: EPA R5 Electronic Records Center
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Image Number	File Name	Date/Time (PDT)	Description of Image
1	DSC02409.jpg	2022-08-02 13:09	Scrap pile where appliances go
2	DSC02410.jpg	2022-08-02 13:19	Facility entrance sign